

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

Loramax LLC, Plaintiff,

v.

Frontier Airlines, Inc., Defendant.

Civil Action No. 2:15-cv-00752-RWS-RSP

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND
TO FONTIER AIRLINES, INC.'S MOTION TO DISMISS FOR FAILURE TO STATE A
CLAIM**

Plaintiff Loramax LLC ("Plaintiff"), hereby requests that the Court enter an Order extending the deadline for Plaintiff to respond to Frontier Airlines, Inc.'s ("Defendant") motion to dismiss for failure to state a claim for fifteen (15) days (Dkt. No. 9).

Lead counsel for Plaintiff, Mr. Hare, was on vacation in Europe from July 16, 2015 until July 26, 2015. Counsel for Plaintiff, Mr. Haynes, has been on medical leave since about July 23, 2015; he is not expected to return from leave until next week (on or about August 10, 2015). Further, counsel for Plaintiff, Mr. Dyer, is on vacation from this week, from August 1 to August 10, 2015.

The present motions are based 35 U.S.C. § 101 or patent eligibility, which is a fast developing field of law since the Supreme Court's recent decision in *Alice Corp. Pty. Ltd. v. CLS Bank Int'l*, 134 S. Ct. 2347 (2014). Accordingly, Plaintiff requires additional time to research new developments in case law related the issues presented in the motion.

This request is not made for the purposes of delay, but in order to allow counsel to evaluate the claims at issue and determine the appropriate response. Defendant does not oppose the relief requested herein.

Accordingly, good cause exists for granting this motion.

A proposed order granting this unopposed motion is attached.

DATED August 6, 2015.

Respectfully submitted,

/s/ Jaspal S. Hare
By: _____

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ATTORNEYS FOR PLAINTIFF
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CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served on Thursday, August 06, 2015 with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Jaspal S. Hare
Jaspal S. Hare